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October 18, 2024

VIA ECF

**APPLICATION GRANTED
SO ORDERED**

Hon. John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007


John G. Koeltl, U.S.D.J.

10/18/24.

Re: *Travelers Casualty & Surety Company of America, et al. v. Greater New York Mutual Insurance Company*, Case No. 1:24-cv-02928-JGK

Dear Judge Koeltl:

The undersigned represent the Plaintiffs and Defendant in the above-referenced matter and write jointly to update Your Honor on settlement discussions and to request additional time for the parties to file a 26(f) report. As you know, Plaintiffs seek a declaration that the Defendant has a duty to defend their mutual insureds in an underlying action titled *Betsey Zimmerman, et al. v. 410-57 Corp., et al.* pending in Supreme Court of the State of New York, New York County, Index No. 653569/2020.

The parties continue to engage in substantive and productive settlement discussions and all counsel remain optimistic that the dispute can be settled. Defendant's counsel has requested certain documentation in connection with the negotiations and Plaintiffs' counsel are working to respond to that request. To that end, we jointly request an additional 45-day extension of time for the parties to file a 26(f) report to December 2, 2024. The report is currently due on October 18, 2024.

All counsel have agreed to the 45-day extension of time requested herein. There have been three previous requests made by the parties (ECF Documents 17, 19, and 23), which Your Honor has granted.

Clyde & Co US LLP is a Delaware limited liability partnership with offices in Atlanta, Boston, Chicago, Denver, Las Vegas, Los Angeles, Miami, New Jersey, New York, Orange County, Phoenix, San Francisco and Washington D.C.

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We thank the Court for its time and consideration.

Respectfully submitted,



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